

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

LEK SECURITIES
CORPORATION, et al.,

Defendants.

Case No. 17-CV-1789 (DLC)

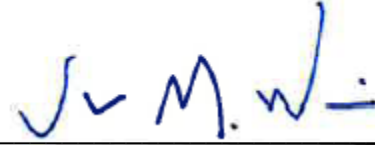
**DEFENDANTS AVALON FA LTD'S, NATHAN FAYYER'S, AND SERGEY
PUSTELNIK'S MEMORANDUM OF LAW IN SUPPORT OF MOTION *IN LIMINE* TO
PROHIBIT THE SEC FROM EQUATING SO CALLED
"LAYERING" WITH MANIPULATION**

PLEASE TAKE NOTICE that, upon Defendants Sergey Pustelnik, Nathan Fayyer, and Avalon FA Ltd.'s ("Defendants") Memorandum of Law in Support of their Motion *in Limine* to Prohibit the SEC from Equating So Called "Layering" with Manipulation and all pleadings, papers and proceedings in this action, Defendants will move this Court before the Honorable Denise L. Cote at the U.S. Courthouse located at 500 Pearl Street, NY, NY, at a date to be determined by the Court, for an Order precluding the Plaintiff from equating "layering" with manipulation at trial, and for such other relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's June 12, 2019 Scheduling Order, Plaintiff shall serve opposing papers no later than September 27, 2019, reply papers shall be due October 2, 2019.

Dated: September 13, 2019

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. M. Wines", is positioned above a horizontal line.

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